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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MLW Media LLC,

Plaintiff,

v.

World Wrestling Entertainment, Inc.,

Defendant.

Case No. 5:22-cv-179-EJD

**DECLARATION OF DEREK W.
KELLEY IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
ANSWER TO FIRST AMENDED
COMPLAINT PURSUANT TO
LOCAL RULES 6-2 AND 7-12**

The Hon. Edward J. Davila

DECLARATION OF DEREK W. KELLEY

I, Derek W. Kelley, declare as follows:

1. I am a partner at the law firm of K&L Gates LLP, counsel for Defendant World Wrestling Entertainment, Inc. (“WWE”). I submit this declaration in support of WWE’s Stipulation and [Proposed] Order Extending Time to Answer to First Amended Complaint Pursuant to Local Rules 6-2 and 7-12. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if called as a witness in this matter on those facts.

2. On June 29, 2023, the parties conferred and agreed to extend the deadline for WWE to file its Answer to the First Amended Complaint to August 14, 2023.

Reasons for the Requested Enlargement of Time

3. WWE recently retained new counsel and requires adequate time to investigate the allegations in the First Amended Complaint.

All Previous Time Modifications in this Case

4. On March 15, 2022, the parties stipulated to extend the briefing schedule on WWE’s Motion to Dismiss Plaintiff’s Complaint (Dkt. 20).

5. On March 14, 2023, parties stipulated to extend the briefing schedule on WWE’s Motion to Dismiss Plaintiff’s First Amended Complaint (Dkt. 67).

Effect of the Requested Time Modification on the Schedule for the Case

6. The requested extension of time will not have an effect on the schedule for this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of June, 2023 in Washington, D.C.

/s/ Derek K. Kelley
Derek K. Kelley.